



**May 17, 2019**

Secretary Shawn M. Garvin  
Department of Natural Resources and Environmental Control  
89 Kings Hwy SW, Dover, DE 19901  
302.739.9000

**RE: Proposed upgrades to South Coastal and Rehoboth wastewater treatment facilities NPDES Permit No. DE0050008 (State Number WPCC 3012F/74).**

Secretary Garvin,

The Delaware Chapter of the Surfrider Foundation (Surfrider) submits these comments concerning the proposed upgrades at both the South Coastal and Rehoboth wastewater treatment facilities.

Surfrider is a grassroots environmental organization dedicated to the protection and enjoyment of the ocean, waves, and beaches through a powerful activist network. We submit these comments on behalf of our 81 chapters, 86 youth clubs, and more than 500,000 supporters, activists, and members in the United States, including the local Delaware Chapter of the Surfrider Foundation.

We would like to request a public hearing about the proposed upgrades to the South Coastal and Rehoboth wastewater treatment facilities. The hearing should be held in a location convenient to the areas affected. The limited information about the projects warrants additional public outreach and information sharing.

Sussex County and the City of Rehoboth Beach are proposing upgrades, expansion and refurbishment of their respective wastewater treatment facilities, South Coastal and Rehoboth. The primary objective of the South Coastal improvements is to expand the

plant to a maximum month capacity of ten million gallons per day (10 MGD) by duplicating the existing secondary and tertiary treatment facilities and by modifying the preliminary treatment, flow equalization, disinfection, effluent pumping and solids handling facilities. The primary objective of the Rehoboth improvements is to replace the existing unreliable power distribution system.

Surfrider is concerned that impacts from the increase in wastewater discharge could negatively affect marine habitats or species found off the Delaware coast. We are also concerned that the increase in wastewater discharge could negatively affect the health of the beach-going public and the tourism and recreation economy.

Surfrider also requests an analysis of new wastewater treatment technology, to make sure Delaware is choosing the best methods instead of simply choosing what has worked in the past and duplicating that technology.

Please allow the public to become more informed about this project and hold a public meeting, along with allowing time for the public to comment.

Thank you,

Kevin Chandler, Chair  
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